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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,	)	CR 12-00834 EMC
	)	
14 Plaintiff,	)	STIPULATION AND [PROPOSED] ORDER
	)	EXCLUDING TIME UNDER THE SPEEDY
15 v.	)	TRIAL ACT FROM DECEMBER 20, 2012 TO
	)	JANUARY 30, 2013
16 MONICO DOMINGUEZ,	)	
17 JUAN DOMINGUEZ, JR.,	)	
SHAWN GEERNAERT	)	
	)	
18 Defendant.	)	
	)	

19 \_\_\_\_\_  
20  
21 On December 20, 2012, the parties in this case appeared before the Honorable Edward M.  
22 Chen for an initial appearance. At that time, the parties represented that the government had just  
23 produced to defense counsel a voluminous set of discovery, including multiple CDs worth of  
24 video and audio recordings and that the defense would need additional time to review the  
25 discovery and to conduct additional investigation. Accordingly, the parties jointly requested an  
26 extension of time and stipulated that time should be excluded from December 20, 2012 to  
27 January 30, 2013, for effective preparation of defense counsel. The parties represented that  
28 granting the continuance was for the reasonable time necessary for effective preparation of

1 defense counsel, taking into account the exercise of due diligence. See 18 U.S.C. §  
2 3161(h)(7)(A) and (B)(iv).

3 The parties also agreed that the ends of justice served by granting such a continuance  
4 outweighed the best interests of the public and the defendants in a speedy trial. See 18 U.S.C. §  
5 3161(h)(7)(A).

6  
7 IT IS SO STIPULATED:

8 MELINDA HAAG  
United States Attorney

9 DATED: January 29, 2013

10 /s/  
RANDY LUSKEY  
Assistant United States Attorney

11  
12 DATED: January 29, 2013

13 /s/  
JAI GOHEL  
Attorney for Monico Dominguez

14  
15 DATED: January 29, 2013

16 /s/  
JODI LINKER  
Attorney for Juan Dominguez Jr.

17  
18 DATED: January 29, 2013

19 /s/  
JOSEPH STOGNER  
Attorney for Shawn Geernaert

20  
21 IT IS HEREBY ORDERED that time is excluded under the Speedy Trial Act from December  
22 20, 2012 to January 30, 2013, under 18 U.S.C. § 3161(B)(iv) and 18 U.S.C. § 3161(h)(7)(A).

23  
24 IT IS SO ORDERED.

25  
26 DATED: 1/31/13

27  
28 STIP. & [PROP.] ORDER EXCL. TIME  
CR 12-00834 EMC

